Administration ("GSA"), National Security Counsel ("NSC"),
Residence Staff, and White House Office of Personnel ("WHOP").

In July 1993, OPS began the process of requesting background reports for the Update Project. OPS first requested background reports for individuals who worked in offices within the White House that historically had little turnover (e.g., NPS, AT&T, C&P Telephone). Ms. Gemmell advised the OPS staff that the White House Office Personnel list should be processed last in the Update Project, as this group would have substantial turnover relative to other offices. When Ms. Gemmell met with Mr. Marceca, she briefly explained the Update Project and showed him the Secret Service list that she had obtained in early June. OPS of the project and showed him the Secret Service list that she had obtained in early June.

1. Mr. Marceca Routinely Proceeded Through the Offices and Names on the June 10, 1993 List.

The OIC's analysis of Mr. Marceca's requests revealed that the FBI did not receive Mr. Marceca's first "Nussbaum" form requesting a background report related to the Update Project until September 3, 1993, more than two weeks after his detail

 $^{^{73}}$ Gemmell 6/26/96 SJC Int. at 66-67.

 $^{^{74}}$ Id. at 58-60.

 $^{^{75}}$ <u>Id.</u> at 58-59.

 $^{^{76}}$ Marceca 6/9/96 Decl. at 1-2; Marceca 6/18/96 HCGRO Depo. at 62-63. Ms. Gemmell's recollection of the meeting is more vague. She recalls a more general discussion of the operation of OPS, however she does recall showing Mr. Marceca the Secret Service list. Gemmell 6/26/96 SJC Int. at 82.